

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
LESLYE KNOX, Individually, and as Natural Guardian :  
of Plaintiffs Jordan Terrell Ellis, Reuven Carter, :  
Shanon Carter, Shayrah Carter, Yoshavyah Carter and :  
Amitai Carter, JORDAN TERRELL ELLIS, minor, :  
REUVEN CARTER, minor, SHANON CARTER, minor, :  
SHAYRAH CARTER, minor, YOSHAVYAH CARTER, :  
minor, AMITAI CARTER, minor, by their Next Friend and :  
Guardian Leslye Knox, and TSAPHRIRAH ELLIS, :

Plaintiffs-Judgment Creditors, :

- against - :

THE BANK OF NEW YORK, :

Defendant-Garnishee :

PALESTINE MONETARY AUTHORITY, :

Applicant for Intervention. :  
-----X

07 Civ. 3349 (VM)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

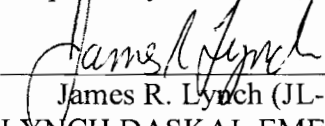
Pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, I, James R. Lynch, Esq., a member of the bar of this Court, will move this Court, at 10:00 a.m. on June 1, 2007, or as soon thereafter as counsel may be heard, for an order allowing the admission *pro hac vice* of

Applicant's Name: Haig V. Kalbian  
Firm Name: Kalbian Hagerty LLP  
Address: 888 17th Street, NW, Suite 1000  
City/State/Zip: Washington, DC 20006  
Telephone/Fax: (202) 223-5600/(202) 223-6625  
Email Address: hkalbian@kalbianhagerty.com

Mr. Kalbian is a member in good standing of bars of the District of Columbia, the Commonwealth of Virginia, and is inactive in the State of Pennsylvania.<sup>1</sup>

Dated: May 22, 2007  
New York, New York

Respectfully submitted,

  
\_\_\_\_\_  
James R. Lynch (JL-2778)  
LYNCH DASKAL EMERY LLP  
264 West 40th Street  
New York, New York 10018  
(212) 302-2400  
*Attorneys for Palestine Monetary Authority*

TO: Robert J. Tolchin, Esq.  
Jaroslawicz & Jaros  
150 William Street, 19<sup>th</sup> Floor  
New York, NY 10038

David Strachman, Esq.  
Mcintyre, Tate & Lynch, LLP  
321 South Main Street, Suite 400  
Providence, RI 02903  
*Attorneys for Plaintiffs/Judgment Creditors*

Kenneth M. Bialo, Esq.  
Emmet, Marvin & Martin, LLP  
120 Broadway, 32nd Floor  
New York, NY 10271  
*Attorneys for Defendant-Garnishee*

---

<sup>1</sup> As indicated in the accompanying Affirmation, Mr. Kalbian is registered as “voluntarily inactive” in the Supreme Court of Pennsylvania as of August 1, 1986.

James R. Lynch (JL-2778)  
LYNCH DASKAL EMERY LLP  
264 West 40th Street  
New York, NY 10018  
(212) 302-2400

-and-

KALBIAN HAGERTY L.L.P.  
888 17<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20006  
(202) 223-5600

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SOUTHERN DISTRICT OF NEW YORK**

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Shanon Carter, Shayrah Carter, Yoshavyah Carter and	: 07 Civ. 3349
Amitai Carter, JORDAN TERRELL ELLIS, minor,	:
REUVEN CARTER, minor, SHANON CARTER, minor,	: <b>AFFIRMATION OF</b>
SHAYRAH CARTER, minor, YOSHAVYAH CARTER,	: <b>JAMES R. LYNCH</b>
minor, AMITAI CARTER, minor, by their Next Friend and	: <b>IN SUPPORT OF MOTION</b>
Guardian Lesley Knox, and TSAPHRIRAH ELLIS,	: <b>TO ADMIT COUNSEL</b>
	: <b><u>PRO HAC VICE</u></b>
Plaintiffs-Judgment Creditors,	:
	:
- against -	:
	:
THE BANK OF NEW YORK,	:
	:
Defendant-Garnishee	:
	:
PALESTINE MONETARY AUTHORITY,	:
	:
Applicant for Intervention.	:
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Pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York Governing Admission to the Bar, James R. Lynch, Esq., a member of the bar of this Court, hereby moves for the admission of Haig V. Kalbian, Esq., *pro hac vice*. In support of said motion, I state as follows:

1. I am a member of the law firm of Lynch Daskal Emery LLP, whose office is located at 264 West 40<sup>th</sup> Street, New York, New York 10018.

2. I am a member in good standing of the Bar of the State of New York and of the Bar of the State of New Jersey. I am admitted to practice before this Court, the United States District Court for the Eastern District of New York, the United States District Court for the Northern District of New York, and the United States District Court for the District of New Jersey, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court.

3. For this amended motion, I rely on the Affidavit of Haig V. Kalbian, attached hereto as Exhibit A, in which Mr. Kalbian affirms that: (A) he is an attorney with the law firm of Kalbian Hagerty L.L.P., 888 17<sup>th</sup> Street, NW, Suite 1000, Washington, D.C. 20006; (B) he is a member in good standing of bars of the highest state courts in two jurisdictions, the District of Columbia, the Commonwealth of Virginia, and is inactive in the State of Pennsylvania<sup>1</sup>; (C) there have been no disciplinary actions filed against Mr. Kalbian in any jurisdiction nor is he aware of any threatened action; and (D) he has been retained, through Kalbian Hagerty L.L.P., by Proposed Intervenor, Palestine Monetary Authority as counsel to represent his interests in the case captioned above.

4. Mr. Kalbian is also admitted to practice in the United States District Court for the District of Columbia, the United States District Court for the District of Maryland, the United States Bankruptcy Court for the District of Maryland, the United States Court of Appeals for the District of Columbia Circuit, the United States District Court for the Eastern District of Virginia and the United States Court of Appeals for the Second Circuit.

5. Mr. Kalbian is not a member of the Bar of the State of New York.

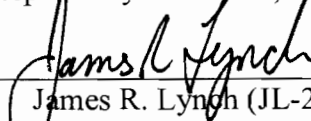
6. I certify that Mr. Kalbian is an attorney of good moral character.

7. Mr. Kalbian has appeared before this Court in the case styled, 4 Third Avenue Leasehold, LLC v. Permanent Mission of the United Arab Emirates to the United Nations, Civil Case No. 02CV4293 (AKH)(dismissed with prejudice April 4, 2003), pursuant to a *pro hac vice* admission. Mr. Kalbian has appeared in the case styled, Beautiful Jewellers Private Limited v. Tiffany & Co., Civil Case No. 06CV3085 (KMW), pursuant to a *pro hac vice* admission. Mr. Kalbian has also appeared in the case styled, Celeste Trust Reg., Esquire Trade and Finance, Inc. and Investcor, LLC, v. CBQ, Inc., et al., Civil Case No. 03CV9650 (RMB), pursuant to a *pro hac vice* admission.

WHEREFORE, I respectfully request that the Court enter an order admitting Haig V. Kalbian *pro hac vice* as counsel for Palestine Monetary Authority and permitting Mr. Kalbian to appear on its behalf for all purposes in the matter captioned above, including but not limited to appearing on its behalf to argue any and all motions and hearings in this matter and any other matters before this Court related to the case captioned above.

Dated: May 22, 2007  
New York, New York

Respectfully submitted,

  
James R. Lynch (JL-2778)  
LYNCH DASKAL EMERY LLP  
264 West 40th Street  
New York, New York 10018  
(212) 302-2400

*Attorneys for Palestine Monetary Authority*

---

<sup>1</sup> Mr. Kalbian is registered as "voluntarily inactive" in the Supreme Court of Pennsylvania as of August 1, 1986.

TO: Robert J. Tolchin, Esq.  
Jaroslawicz & Jaros  
150 William Street, 19<sup>th</sup> Floor  
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Plaintiffs-Judgment Creditors, :

- against - :

THE BANK OF NEW YORK, :

Defendant-Garnishee :

PALESTINE MONETARY AUTHORITY, :

Applicant for Intervention. :  
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**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of James R. Lynch, attorney for Palestine Monetary Authority and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Haig V. Kalbian
Firm Name:	Kalbian Hagerty LLP
Address:	888 17 <sup>th</sup> Street, NW, Suite 1000
City/State/Zip:	Washington, DC 20006
Telephone/Fax:	(202) 223-5600/(202) 223-6625
Email Address:	hkalbian@kalbianhagerty.com

is admitted to practice pro hac vice as counsel for Proposed Intervenor Palestine Monetary Authority in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of



this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: May \_\_\_\_, 2007  
New York, New York

---

United States District Judge

With copies to:

James R. Lynch, Esq.  
Scott R. Emery, Esq.  
LYNCH DASKAL EMERY LLP  
264 West 40th Street  
New York, NY 10018

Haig V. Kalbian, Esq.  
Mary M. Baker, Esq.  
KALBIAN HAGERTY LLP  
888 17<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20006  
*Attorneys for Palestine Monetary Authority*

Robert J. Tolchin, Esq.  
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James R. Lynch (JL-2778)  
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212-302-2400

-and-

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:  
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**AFFIDAVIT OF HAIG V. KALBIAN**

1. My name is Haig V. Kalbian. I am over 21 years of age. I have personal knowledge of the matters herein and am otherwise competent to testify as to the matters contained herein.

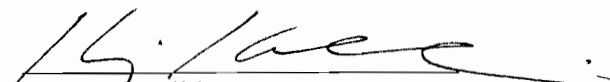
2. I am a partner at the law firm of Kalbian Hagerty L.L.P., located at 888 17<sup>th</sup> Street, N.W., Suite 1000, Washington, D.C. 20006.
3. I received a Juris Doctor from the University of Notre Dame in 1983.
4. I am a member in good standing of the bars of the District of Columbia, the Commonwealth of Virginia. I am inactive in the State of Pennsylvania. I was admitted to practice before the District of Columbia Court of Appeals in August 2001 and the Supreme Court of Virginia in September 1991. Certificates of Good Standing issued by the District of Columbia Court of Appeals and the Supreme Court of Virginia (within thirty days of the date of this Affidavit and the accompanying Motion) are attached hereto as **Exhibit 1**.
5. I am also admitted to practice in the United States District Court for the District of Maryland, the United States Bankruptcy Court for the District of Maryland, the United States District Court for the District of Columbia, the United States Court of Appeals for the District of Columbia Circuit, the United States District Court for the Eastern District of Virginia and the United States Court of Appeals for the Second Circuit.
6. I am not a member of the Bar of the State of New York.
7. I have appeared before this Court in the case styled, 4 Third Avenue Leaschold, LLC v. Permanent Mission of the United Arab Emirates to the United Nations, Civil Case No. 02CV4293 (AKH) pursuant to a *pro hac vice* admission. I have also appeared in the case styled, Beautiful Jewellers Private Limited v. Tiffany & Co., Civil Case No. 06CV3085 (KMW), pursuant to a *pro hac vice* admission, and in the case styled, Celeste Trust Reg., Esquire Trade and Finance, Inc. and Investcor, LLC, v. CBQ, Inc., et al., Civil Case No. 03CV9650 (RMB), pursuant to a *pro hac vice* admission.

8. There are no disciplinary proceedings against me pending in any court or bar association in any jurisdiction.

9. Proposed Intervenor, Palestine Monetary Authority has retained my law firm, Kalbian Hagerty L.L.P., to represent the interests in the above-captioned case and any other related proceedings that may arise in connection with the case.

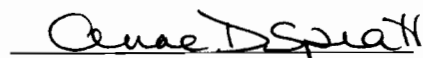
**FURTHER AFFIANT SAYETH NOT.**

District of Columbia

  
Haig V. Kalbian

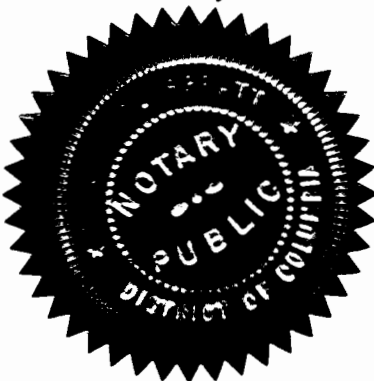
Date: 5/21/07

Subscribed to and sworn to before me in  
Washington, D.C., this 21 day of May 2007.

  
Notary Public

My Commission Expires:  
12/14/08

Anne D. Spratt  
Notary Public District of Columbia  
My Commission Expires 12/14/08





District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

HAIG V. KALBIAN

---

was on the 16<sup>th</sup> day of July, 1986

---

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 17,  
2007.

GARLAND PINKSTON, JR., CLERK

By: *Recher Corbin*  
Deputy Clerk

# Supreme Court of Virginia

AT RICHMOND

## Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,  
do hereby certify that

HAIG VAHAN KALBIAN

was admitted to practice as an attorney and counsellor at the bar of this Court on  
September 17, 1991.

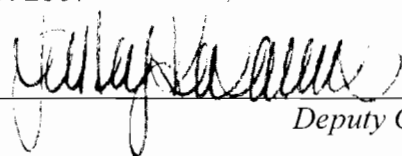
I further certify that so far as the records of this office are  
concerned, HAIG VAHAN KALBIAN is a member of the bar of this Court  
in good standing.

**Witness** my hand and seal of said Court

This 14th day of May

A.D. 2007

By:



*Deputy Clerk*

**LYNCH DASKAL EMERY LLP**

264 West 40th Street  
New York, NY 10018  
Attorneys for Palestine Monetary Authority

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PALESTINE MONETARY AUTHORITY, :  
:  
Applicant for Intervention. :  
-----X

STATE OF NEW YORK )  
) ss.:  
COUNTY OF NEW YORK )

DYAN KLEINMAN, being duly sworn, deposes and says:

1. I am not a party to this action, am over 18 years of age, and I am a paralegal at the offices of Lynch Daskal Emery LLP. I reside at 173 ORCHARD STREET, WHITE PLAINS, NY 10604.



2. On the 22nd day of May, 2007, I served by first class mail a copy of the within **MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIRMATION OF JAMES R. LYNCH IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE, and ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION** by depositing true and correct copies of the same, enclosed in post-paid, properly addressed envelopes, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York addressed as follows:

**Robert J. Tolchin, Esq.**  
**Jaroslawicz & Jaros**  
**150 William Street, 19<sup>th</sup> Floor**  
**New York, New York 10038**

**Kenneth M. Bialo, Esq.**  
**Emmet, Marvin & Martin, LLP**  
**120 Broadway, 32nd Floor**  
**New York, New York 10271**

**David Strachman, Esq.**  
**McIntyre, Tate & Lynch, LLP**  
**321 South Main Street, Suite 400**  
**Providence, RI 012903**

  
DYAN KLEINMAN

Sworn to before me  
this 23rd day of May 2007

**IAN L. KELLEY**  
Notary Public State of New York  
Kings County  
LIC.# 02KE6152707  
Comm. Exp. 09/18/2010  
Notary Public

